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U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN BRIAN SCANLON, and
NICOLE M. WITBECK,

Defendant.

8:14CR 144

INDICTMENT

21 U.S.C. § 846
21 U.S.C. §§ 841(a)(1), (b)(1)(B), (b)(1(C)
21 U.S.C. §§ 853(a)(1), (a)(2)

The Grand Jury charges:

COUNT I

From an unknown date but at least as early as November 1, 2012, and continuing to on or about December 16, 2013, in the District of Nebraska and elsewhere, the Defendant, STEPHEN BRIAN SCANLON, knowingly and intentionally combined, conspired, confederated and agreed with other persons, both known and unknown to the Grand Jury, to commit the following offenses against the United Sates: distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

In violation of Title 21, United States Code, Section 846.

COUNT II

From an unknown date but at least as early as November 1, 2012, and continuing to on or about December 16, 2013, in the District of Nebraska and elsewhere, the Defendant, NICOLE M. WITBECK, knowingly and intentionally combined, conspired, confederated and agreed with other persons, both known and unknown to the Grand Jury, to commit the following offences against the United Sates: distribute and possess with intent to distribute more than 50 kilograms of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

FORFEITURE ALLEGATION

The Defendant, STEPHEN BRIAN SCANLON, shall forfeit to the United States any and all property constituting or derived from any proceeds said Defendant obtained directly or indirectly as a result of the violation alleged in Count I of this Indictment and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count I of this Indictment, including but not limited to the $90,080.00, cash, seized from STEPHEN BRIAN SCANLON'S rental car on October 19, 2013, and the $15,000.00, cash, posted for STEPHEN BRIAN SCANLON'S bond on October 22, 2013 at the York County, Nebraska jail.

In violation of Title 21, United States Code, Sections 853(a)(1) and (a)(2).

A TRUE BILL.

[redacted]

FOREPERSON

DEBORAH R. GILG
United States Attorney
District of Nebraska

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

NANCY A. SVOBODA
Assistant United States Attorney